

# Manufacturer Identification of Recycled Content

## Introduction

This fact sheet is provided by the California Integrated Waste Management Board (CIWMB) to assist manufacturers and suppliers to certify the recycled content of their products. The certification process assures potential buyers that the recycled-content products (RCP) are in conformance with federal or State law, local ordinances, and consumer demand.

### ***Why is identifying recycled content important?***

Federal, State, and local governments all have laws requiring them to purchase RCPs. In addition, many private corporations—large and small—have RCP procurement policies, and the general public is looking for these products as well. But there are no universal, consistent definitions of recycled-content terminology. Therefore, proper labeling of RCPs is very important.

Since many people are looking for RCPs, your products will benefit from an RCP designation. And since everyone has different ideas about RCPs, the exact content of the product should be identified so buyers can see for themselves if your product meets their needs.

In addition, the Public Contract Code requires all product suppliers to certify the recycled content of all products offered or sold to California State agencies. This is just one part of the RCP procurement requirements for State agencies.

### ***What are the recycled-content certification laws?***

Public Contract Code (PCC) sections 10233, 10308.5, and 10354 require all vendors and contractors to certify in writing, under penalty of perjury, to the State agency awarding a contract, the minimum, if not the exact, percentage of postconsumer and secondary material in the materials, goods, or supplies offered or used.

Furthermore, PCC section 12205(a) requires all State agencies to require all contractors to certify in writing, under penalty of perjury, the minimum, if not the exact, percentage of postconsumer and secondary material in the materials, goods, or supplies provided or used.

### ***What are the RCP procurement requirements for State agencies?***

The CIWMB oversees the State Agency Buy Recycled Campaign (SABRC). The SABRC mandate (Public Contract Code sections 12200-12320) requires State agencies and the Legislature to purchase RCPs instead of non-RCPs. State



agencies are mandated to ensure that at least 50 percent of the dollars spent on products within 11 product categories and

25 percent of the dollars in a 12th category are spent on RCPs (see chart on page 3). State agencies must annually report to the CIWMB their total dollars spent on purchases within each of the 12 product categories, along with the total dollars spent on RCPs within each category. State law also requires product suppliers to certify the recycled content of all products offered or sold to the State (both secondary and postconsumer).

### ***What do “virgin material,” “recycled content,” “postconsumer material,” and “secondary material” mean for SABRC purposes?***

The “Buy Recycled” mandates governing the SABRC provide specific definitions for these terms. The term “recycled content” refers to either postconsumer or secondary material; it does not discriminate between the two, therefore, must be further described by actual postconsumer and/or secondary material content.

- Virgin material content is that portion of the product made from non-recycled material, or the material that is neither secondary nor postconsumer.
- Postconsumer material is defined as “a finished material which would have been disposed of as a solid waste, having completed its life-cycle as a consumer item, and does not include manufacturing wastes.” This is material such as discarded newspaper that was recycled and then made into recycled-content newsprint or some other recycled product.
- Secondary material is defined as “fragments of finished products or finished products of a manufacturing process, which has converted a resource into a commodity of real economic value, but does not include excess virgin resources of the manufacturing process.” This is material such as newsprint that is trimmed from a roll in the paper plant and made into recycled-content newsprint. The material (product) did not get to the consumer before being recycled.

The supplier must identify the minimum percentage of postconsumer material and must also certify the amount of secondary material.

Secondary material **DOES NOT** include postconsumer material. For example, if a printing and writing paper contained 20 percent postconsumer material, you would indicate 20 percent postconsumer content. If the product contained 40 percent secondary material and 20 percent postconsumer material, you would indicate 40 percent secondary content and 20 percent postconsumer content.

To meet the 50/10 content requirement (50 percent total recycled content, 10 percent postconsumer content), a product would need to contain at least 10 percent postconsumer material and 40 percent secondary material (and 50 percent virgin material). However, a product containing 50 percent postconsumer and 50 percent virgin material would also meet the requirement.

*The amount of virgin, postconsumer, and secondary material must equal 100 percent.*

### ***How do I certify “multiple material” products?***

For products made from multiple materials, choose the material that comprises the majority of the product either by weight, volume, or material cost.

For instance, if a chair is made from steel, aluminum, and plastic, and most of the material—either by weight, volume, or cost—is plastic, report it as a plastic product. If most of the product is steel, report the chair as a steel product. If that plastic or steel is recycled-content material, then the purchase is reportable as a recycled-content purchase.

*Note:* Please do not describe the recycled content of individual components. Once you determine what category the product will be reported in, consider that to be 100 percent of the product.

### ***How do I identify the recycled content of my products?***

Identify the total postconsumer content and the secondary material content of your product(s):

- On product labeling.
- In your catalog descriptions.
- On your Web site.
- In product advertising.
- On the recycled-content certification form.

Or, all of the above.

### ***What would the certification look like?***

Regardless of how the recycled content is provided, you must identify total recycled content, postconsumer content, and secondary material content. Sample language may look like the following:

- 100 percent recycled with 30 percent postconsumer paper fiber.
- Made from 75 percent recycled plastic, 30 percent postconsumer.
- Lumber made from 100 percent postconsumer recycled plastic.
- 100 percent postconsumer tire-derived product.

Be concise! Do not use ambiguous descriptions like these:

- 100 percent recycled plastic.
- 48 percent recycled material.
- 30 percent recycled content.
- 25 percent postconsumer waste.

Ambiguous content percentages will be treated as secondary content that does not meet State procurement mandates. In addition, the material content must be described as belonging to one of the 12 recycled product categories such as “plastic, paper, steel, paint, glass . . .”

Remember: When postconsumer or secondary material isn’t labeled, your customers will assume the product contains only virgin materials.

Product Categories	Content Requirement (%)	Procurement Mandates (%)
Printing and writing papers (PWP)	30% Postconsumer (PC)	25%
Paper products (PP)	50% Total recycled content (TRC) 10% PC	50%
Plastic products (PL)	50% TRC 10% PC	50%
Compost/co-compost (CO)	50% TRC 10% PC	50%
Glass products (GL)	50% TRC 10% PC	50%
Lubricating oils (LO)	70% Re-refined base oil	50%
Paint (PT)	50% PC	50%
Solvents (SO)	70% PC	50%
Anti-freeze (AF)	70% PC	50%
Tire-derived products (TD)	50% PC	50%
Steel products (ST)	25% TRC 10% PC	50%
Tires (TI)	50% TRC 10% PC	50%

**What are the minimum content and procurement requirements for the 12 product categories? (See table at lower left.)**

## Product Category Descriptions

### Printing and Writing

**Paper:** Copy and xerographic papers, high-grade paper such as watermarked and cotton fiber papers, high-speed copier paper, offset paper, forms bond, computer paper, non-carbon paper, manila file folders, white wove envelopes, non-coated printing and writing papers, book paper, newsprint, ruled tablets, posters, index cards, and calendars.



**Paper Products:** Paper janitorial supplies, hand towels, facial tissue, toilet paper, seat covers, corrugated boxes, various types of paperboard (boxes, cartons, wrapping, packaging), hanging files, file boxes, building insulation, and containers.

**Plastic Products:** Toner cartridges, diskettes, carpet, office products, plastic lumber, buckets, waste baskets, containers, benches, tables, fencing, clothing, mats, packaging, signs, posts, binders, sheeting, buckets, building products, garden hoses, and trays.

**Compost and Co-Compost Products:** Compost product is derived from organic materials (landscape and tree trimmings; clean wood by-products) diverted from landfills. Compost products are typically used in landscaping and agricultural applications such as soil amendment; erosion or weed control; and turf grass top dressing.

Co-compost products are derived from the blending of compost feedstock with additional organic materials such as food scraps, manures, bio-solids, or other organic by-product. Since compost and co-compost feedstock is virtually comprised of 100 percent recovered materials, both final products should far exceed both the 50 percent recycled and 10 percent postconsumer minimum-content requirements.

**Glass Products:** Windows, test tubes, beakers, laboratory/hospital supplies, fiberglass (insulation), reflective beads, tiles, construction blocks, desktop accessories, flat glass sheets, loose-grain abrasives, deburring media, liquid filter media, and containers.

**Lubricating Oils:** Motor, engine, transmission fluid, power steering, crank case, diesel, transformer dielectric fluid, chain saw, cutting, gear, hydraulic, industrial fluids; and base stock used for tractors, vehicles, fleet cars, trucks, and buses.



**Paint:** Latex paint, graffiti abatement, interior and exterior, maintenance.

**Solvents:** Printer cleaner, copier cleaner, auto/engine degreaser, parts cleaner, and paint thinner.

**Anti-freeze:** Engine coolant added to radiator water in cars, trucks, and many other types of engines.

**Tires:** Truck, passenger, trailer, aircraft, and bus retread.

**Tire-Derived Products.** Flooring mats, wheelchair ramps, playground covers, parking bumpers, bullet traps, hoses, bumpers, truck bed liners, pads, walkways, tree ties, road surfacing, wheel chocks, rollers, traffic control products, mud flaps, and posts.

**Steel Products:** Automobiles, trucks, buses, staplers, appliances, motors, paper clips, motorcycles, steel furniture, desks, pedestals, scissors, jacks, rebar, pipe, plumbing fixtures, chairs, ladders, file cabinets, shelving, containers, lockers, sheet metal, guard rails, and girders.

### CIWMB Contacts

For more information about the CIWMB Buy Recycled Program, visit our Web site at: [www.ciwmb.ca.gov/BuyRecycled/](http://www.ciwmb.ca.gov/BuyRecycled/).

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, Flex Your Power and visit [www.consumerenergycenter.org/flex/index.html](http://www.consumerenergycenter.org/flex/index.html).